FILED

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
U.S. DISTRICT COURT

OCT 26 2020

ELKINS WV 26241

UNITED STATES OF AMERICA,

v.

DAVID CHANGHYUB LEE, Defendant. Criminal No.

2:20cx3'

Violation[s]:

16 U.S.C. § 3372(a)(2)(B) 16 U.S.C. § 3372(d)(2)

INFORMATION

The United States Attorney charges that:

COUNT ONE

(Interstate Transportation of Ginseng in Violation of State Law)

On or about September 28, 2018, in Randolph County and elsewhere, in the Northern District of West Virginia, defendant DAVID CHANGHYUB LEE did knowingly transport in interstate commerce from West Virginia to North Carolina a plant, that is, Panax quinquefolis, commonly known as American ginseng, and in the exercise of due care he, defendant DAVID CHANGHYUB LEE, should have known that the plant was transported in violation of and in a manner unlawful under West Virginia law, that is, West Virginia Code § 19-1A-3a(f); all in violation of Title 16, United States Code, Sections 3372(a)(2)(B) and 3373(d)(2).

> William J. Powell United States Attorney

Stephen Warner Assistant United States Attorney